

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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TEAMSTERS LOCAL UNION NO. 804 and	:	
TEAMSTERS AMAZON NATIONAL	:	
NEGOTIATING COMMITTEE,	:	
	:	Civil Action No. 24-CV-08683 (FB)
Plaintiffs,	:	(TAM)
	:	
-against-	:	
	:	
THE CITY OF NEW YORK; NEW YORK	:	
CITY POLICE COMMISSIONER JESSICA	:	
TISCH, <i>in her official capacity</i> ; NEW YORK	:	
CITY MAYOR ERIC ADAMS, <i>in his</i>	:	
<i>official capacity</i> ,	:	
	:	
Defendants.	:	
	:	
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**DECLARATION OF KELLY DAWSON IN SUPPORT OF  
AMAZON.COM SERVICES, LLC’S MOTION TO INTERVENE**

I, Kelly Dawson, declare as follows:

1. I am currently employed at Amazon.com Services, LLC (“Amazon”) as a Senior Station Manager at Amazon’s DBK4 facility. I am fully familiar with the facts set forth in this declaration based upon my personal knowledge or review of Amazon’s business records.

2. Amazon.com Services LLC, is an e-commerce company that sells and distributes a vast array of goods and services to customers worldwide.

3. Amazon manages different storefronts on Amazon.com. Amazon also handles the delivery and logistics of products for sale, taking orders placed on Amazon.com and shipping them to customers.

4. Amazon operates different fulfillment centers, delivery stations, and sorting facilities, including those specifically referenced in the Complaint: JFK8 and DBK4.

5. DBK4, in particular, is a delivery station located at 55-15 Grand Avenue, Queens, NY 11378.

6. The premises comprising DBK4 cover nearly nine (9) acres and Amazon is the exclusive, long-term lease-holder of the premises.

7. DBK4 operates on a 24-hour, 7-day per week schedule and is dedicated to receiving, storing, assembling, shipping, distributing, preparing, selling and serving as a pickup/drop-off location for products, materials, and merchandise, and for fulfillment of orders and processing of returns.

8. DBK4 also handles parking, storage and use of automobiles, trucks and trailers, including outdoor loading and unloading; light manufacturing, assembly and repairs; outdoor storage; general warehouse, distribution, office and data center use; ancillary and related uses.

9. DBK4 consists of one five-story building.

10. DBK4 has four primary access points, all of which are on Grand Avenue.

(a) The first access point is a vehicle only entrance/exit, which has two lanes—one for entering and one for exiting. This access point is used for general access to DBK4, and used by employees and third-parties who access DBK4.

(b) The second access point has two exit only driveways, which are used only by delivery vans (operated by third party business partners) departing DBK4 to make deliveries to Amazon customers. The first exit driveway has one lane, and the second exit driveway has two lanes. Each lane is wide enough to fit one Amazon van. Each exit driveway has its own gate, which separates the exit driveway from the public sidewalk on Grand Avenue. When vans are not

being dispatched, the gates are closed. When vans are being dispatched, the gate for the exit driveway from which vans are being dispatched is opened.

(c) The third access point is a pedestrian only entrance/edit. This access point has a gate and single door, permitting only individuals who have access via a security card.

(d) The fourth access point is a loading dock / trailer yard. This access point is only used by larger trucks and trailer trucks that delivery products to DBK4. This access point has one wide lane accessible for trailer trucks. Pedestrians and other vehicles are generally not permitted.

11. The protest / picket at DBK4 began on December 19, 2024 and continued over consecutive days, and concluded on December 23, 2024.

12. I was present at DBK4 on December 19, 20, 22, and 23, 2024.

13. During the protest / picket, protestors and picketers were routinely blocking ingress and egress from DBK4, including all of the access points described above.

14. As many as 75-100 persons participated in the protests at DBK4 . Less than 40 of the workers who are employed by Amazon or its third party business partners (out of a total of more than 800) participated in the protests.

15. Officers from the NYPD arrived on site and set up barricades on and around DBK4 to control crowding and ensure the safety of all involved, particularly around the driveway through which the delivery vans (operated by third party business partners) depart to make delivers.

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I declare pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Executed on: 2/6/2025

  
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KELLY DAWSON